

1 AARON D. FORD  
 Attorney General  
 2 NATHAN L. HASTINGS (Bar No. 11593)  
 Senior Deputy Attorney General  
 3 State of Nevada  
 Office of the Attorney General  
 4 555 Wright Way  
 Carson City, NV 89711  
 5 (775) 684-4606 (phone)  
 (775) 684-4601 (fax)  
 6 NHastings@ag.nv.gov  
 Attorney for Defendants Lisa Brannon, Christopher Honholz, and  
 7 State of Nevada Ex. Rel. Department of Public Safety,  
 Division of Parole and Probation  
 8

9 Roger S. Doyle, Esq.  
 Nevada Bar No. 10876  
 10 Kerry S. Doyle, Esq.  
 Nevada Bar No. 10866  
 DOYLE LAW OFFICE, PLLC.  
 11 4600 Kietzke Lane, Ste. I-207  
 Reno, Nevada 89502  
 12 (775) 525-0889  
 (775) 229-4443(fax)  
 13 admin@rdoylelaw.com  
 Attorneys for Plaintiff  
 14

15 UNITED STATES DISTRICT COURT  
 16 DISTRICT OF NEVADA

17 MICHAEL JON RIOS

18  
 19 Plaintiff,

20 vs.

21 STATE OF NEVADA, EX. REL. DEPT/ OF  
 PUBLIC SAFETY; DIVISION OF PAROLE  
 22 AND PROBATION (DIVISION), *et. al.*,

23 Defendants.

Case No. 3:20-cv-438-LRH-CLB

STIPULATION and ORDER FOR STAY OF  
 DISCOVERY PENDING DECISION ON  
 MOTION TO DISMISS

24 As the Division-related Defendants have raised the defense of qualified immunity in their initial  
 25 responsive pleading<sup>1</sup>, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiff  
 26 Michael Jon Rios, by and through counsel Roger S. Doyle and/or Kerry S. Doyle, and Division-related  
 27

28 <sup>1</sup> See *Bahrens v. Pelletier*, 516 U.S. 299, 308 (1996); *Siegert v. Gilley*, 500 U.S. 226, 231 (1991); *Harlow v. Fitzgerald*, 457 U.S. 800, 817-18 (1982) supporting the proposition that discovery should not be allowed and/or may be stayed until the threshold issue of qualified immunity is resolved.

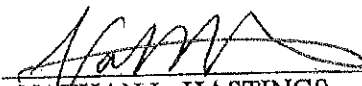
1 Defendants by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and  
2 Nathan L. Hastings, Senior Deputy Attorney General, that discovery in this matter be stayed pending  
3 the Court's decision on Division-related Defendants' Motion to Dismiss.

4  
5 Dated this 11<sup>th</sup> day of January, 2021.

6  
7 Roger S. Doyle  
8 *Attorney for Plaintiff*

9  
10 Dated this 8<sup>th</sup> day of January, 2021

11  
12 AARON D. FORD  
13 *Attorney General*

14  
15 By:   
16 NATHAN L. HASTINGS  
17 Senior Deputy Attorney General  
18 *Attorneys for Defendants*

19  
20 IT IS SO ORDERED:

21  
22 DATED: January 11, \_\_\_\_\_, 2021.

23  
24  
25  
26  
27  
28  
  
United States Magistrate Judge